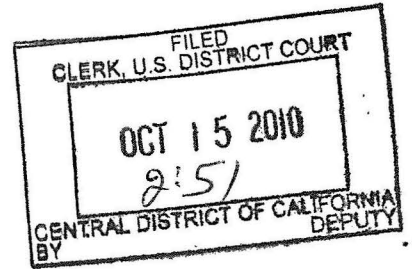


Exhibit 51

CONFORM COPY

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8
9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11

12 VEDERI, LLC, A LIMITED LIABILITY
13 COMPANY

14 Plaintiff,

15 vs.

16 GOOGLE, INC., A DELAWARE CORPORATION

17 Defendant.

Case No.

CV 10 7747-JH/ (CWx)

COMPLAINT FOR PATENT
INFRINGEMENT; DEMAND
FOR JURY TRIAL

18 For its Complaint, Plaintiff, Vederi, LLC ("Vederi"), alleges as follows:
19

20 1. This is an action for patent infringement, brought under the patent
21 laws of the United States, 35 U.S.C. § 271 et seq.

22 **I. JURISDICTION AND VENUE.**

23 2. This is an action for patent infringement brought under the patent
24 laws of the United States, 35 U.S.C. § 271 et seq. Jurisdiction of the patent
25 infringement claims is conferred on this Court under 28 U.S.C. §§ 1331 and
26 1338(a).

27 3. This Court has personal jurisdiction over the Defendant Google, Inc.
28 ("Google") under Fed. R.Civ.P.4(k)(1)(A).

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1 4. Venue is proper in this district under 28 U.S.C. § 1391 in that the
2 unlawful activities herein alleged were performed in whole or in part in this
3 district and in that Defendant does business in this district.

4 **II. PARTIES.**

5 5. Plaintiff, Vederi, is a limited liability company having its principal
6 place of business at 273 Waverly Drive, Pasadena, CA 91105.

7 6. Defendant, Google, is a Delaware corporation having a place of
8 business at 1600 Amphitheatre Parkway, Mountain View, California 94043.

9 **COUNT ONE - PATENT INFRINGEMENT**

10 7. Plaintiff Vederi is the owner of U.S. Patent Nos. 7,239,760 (the "'760
11 patent"), 7,577,316 (the "'316 patent"), 7,805,025 (the "'025 patent") and
12 7,813,596 (the "'596 patent") entitled "System and Method for Creating, Storing
13 and Utilizing Images of a Geographic Location" The '760, '316, '025 and '596
14 patents disclose, *inter alia*, systems and composite images for enabling visual
15 navigation of a geographic area from a user terminal. True and correct copies of
16 The '760, '316, '025 and '596 patents are attached hereto as Exhibits A -D.

17 8. One information and belief, Defendant Google creates, uses,
18 markets, sells, and offers for sale throughout the United States and commercially
19 exploits systems and composite images for enabling ground level, visual
20 navigation of a geographic area from a user terminal including its "Street View"
21 service. Google's ground level, visual navigation services are products used in
22 commerce within this district.

23 9. Defendant's manufacture, use, sale and offer for sale of the Google
24 products constitutes infringement of the '760, '316, '025 and '596 patents under 35
25 U.S.C. § 271.

26 10. Plaintiff has suffered and continues to suffer substantial damage as a
27 direct result of Google's infringement. Under 35 U.S.C. § 284, Plaintiff is entitled
28 to damages adequate to compensate for the infringement, but not less than a

1 reasonable royalty.

2 11. Vederi will be irreparably harmed if Google's patent infringement
3 continues. The balance of equities and public interest favor an injunction in favor
4 of Vederi. Vederi therefore requests permanent injunctive relief prohibiting
5 Google and its officers, employees, agents, affiliates, and anyone else in active
6 concert with it, from making or using, the Google Street View service, or taking
7 any other actions that would otherwise infringe the '760, '316, '025 and '596
8 patents.

9 WHEREFORE, Vederi respectfully requests that this Court enter
10 judgment:

- 11 1. That Google has infringed the '760, '316, '025 and '596 patents;
12 2. Entering a permanent injunction restraining Google and its officers,
13 employees, agents, affiliates, and anyone else in active concert with it, from
14 making, using, marketing, commercially exploiting or taking any other actions
15 that would directly or indirectly infringe the '760, '316, '025 or '596 patents;
16 3. That this case is exceptional, and that Vederi therefore recover
17 reasonable costs, expenses, and attorney's fees, under 35 U.S.C. § 285;
18 4. That Vederi recover such other and further relief as this court may
19 deem appropriate.

20
21 DATED: October 15, 2010

Respectfully submitted,
CHRISTIE, PARKER & HALE, LLP

22
23
24 By 
David A. Dillard, Esq.
Anne F. Bradley, Esq.

25
26 Attorneys for Plaintiff,
Vederi, LLC
27
28

JURY DEMAND

Plaintiff requests a jury trial of all issues in this action so triable.

DATED: October 15, 2010

Respectfully submitted,

CHRISTIE, PARKER & HALE, LLP

By 
David A. Dillard, Esq.

Attorneys for Plaintiff,
Vederi, LLC

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